

In The United States District Court for District
of Delaware
Richard E. Anderson vs C.A. NO. 05-87700F

General Motors Corp.

Objection to their motion for extensions (for the following reason)

Your Honor I just receive their motion on Oct 25, 07
for extension and summary judgment. (objection and
in support of the objection, plaintiff states the
Rolling - (Order) set for Discovery closed on
Oct 12, 2007 and depositive motion are currently due
on or before Nov. 9, 2007.

Defendant Attorney states for extension for Nov. 8-07
to complete discovery and December 8, 2007 to file
its depositive motion. But claims; (by defendant counsel
being unable to successfully schedule plaintiffs
deposition. But there was a date set for the deposition
Sept, 21, 07. I have to sign in at the Front Desk
on that date and met Mr. Michael Burskall; His secretary.
The Deposition was set on Sept 21, 07 and time was at 10:00
AM. — But Mr. (Michael) never show up at the deposition.

FILED
CLERK, U.S. DISTRICT COURT
DISTRICT OF DELAWARE
OCT 24 PM 12:35
2007

Counsel for the defense - Also states (specifically plaintiff
deposition was initially set by Agreement of the parties
for Sept, 8, 2007. (Your Honor) this is untrue - on Sept 7, 07
The mail Agreement 2011 Three (days) later ready AS soon
AS practical we need to get some dates for your deposition
during the month of Sept. to be taken at OUR local counsel
in Willington. EXB letter date of letter Sept 7-07

if we do not receive dates from you on or before
Sept. 14, 2007, we will have to proceed with noting
 up the deposition. on Sept. 10, 2007 Letter
 from Defense Counsel states the following -

DEAR MR. Anderson: (500 Letter Date Sept. 10-07)
Exc. Attach. (PART of Letter)

1. District court's order set date by which discovery
 must be completed and motion must be filed, as such
 we have requested that you provide dates that you are
 available for your deposition on or before Sept. 14, 2007

Your Honor How can counsel say we had make agree
 ment set for Sept 8, 07 when this letter was date
 Sept. 10, 2007 - (counsel for defense is misleading the
 court).

Also, is mislead, when this letter, said (you haven't
 make some allegation with regard to contacting disci-
 plinary counsel as you believe your due process right
 are being compromised, (future) - I contact ODC for
 the false states make about my job status, and violation
 of my civil rights. ODC still investigating).

The agreement, was set for Sept. 21, 07 - And I was there
 But Mr. Williams was not there.

Counsel Also States - I file A motion to STAY, After Agreeing TO His deposition (untrue AS STATED above)

Then go on to said (plaintiff file a motion to STAY the Deposition because he did not receive THE written deposition notice 4 even (17) days prior to the deposit (THIS IS ALSO untrue) SOE what was FILED on Sept. 19, 07 - was NO motion to STAY

Reeds - motion to Dismiss his order for depositions N. R. 30.1 - / Also 26-P37

R.30 - states for Reasonable notice for taking deposition, copy Attach, EXD NOT motion to STAY

Clearly on if FACE -

Counsel go on to say - Due to the motion to STAY And attempt to Avoid unnecessary costs the deposition was cancelled and rescheduled. (All misleading (your) please compare). member it was never set for deposition for Sept. 8, 07 / Sept 10, 07 letter FROM Counsel Reflex that, (PLEASE compare);

— (Clearly misleading the court).
ON PAGE 2 of (Defense counsel motion)

Page 2

(Foot note) - Defense states - counsel has had several discussion
 And sent letter requesting - plaintiff's deposition.
 (unters) - Your Honor as you can see by the evidence
 There was two conversations, on Sept 7, 07 and Sept 10, 07
 See Ex C, correspondence confirms and follow up our
 conversation from this morning. (please compare). Ex C.

Counsel goes on to say - plaintiff refused to agree
 to any deposition date until after the motion to
 stay were decided. - (your Honor again misled
 this court) - the motion I file was denied way
 back before any deposition was requested.
 See Judge order Aug. 16, 07. (Recovery Timeline) Ex E
 By Oct. 12, 07.

Also your Honor there was notice to this court
 on 10-3-07 - for my deposition for Oct 24, 07. Ex A
 notice came with DB-669JFF But was change to 05-87755E

Also notice date Oct 17, 2007 - About Oct 24, 07 At
 9:00. I also request in our conversation for Mr.
 Tyndall to be there also, But was never giving
 a date when he would be available. (Not yet).

Ex F Attach - letter from Counsel, Mr. William.
 Also letter dated Oct. 19, 2007. (No dates or time
 for Tyndall - deposition - this is one of the reason
 I also request for extension But NO answer
 from the court. (yet). Ex G -

Page 2

Counsel - State (Plaintiff's deposition currently set for this Wednesday Oct 12-07. (In which I was there and did my deposition). This time Mr. William was there to

Counsel State the Following - (it was properly notice prior to the close of discovery. →) (my answer - But G.M. knew there was a deadline set for discovery for Oct 12-07 (in which I file my) G.M. fail to file for Answer under THE Rules of this Court R.16.4. Request for Extension for the deadline of discovery of Honorable Judge TAMM order 150t for Oct. 12.07. There motion (was) ^{NOT} file until Oct 23.07. for extension see docket sheet Attach EX H.

Counsel State (In Fact; At Plaintiff's Request Counsel Agreed to see if Mr. Tyndall's deposition could be taken on that date also;

Your Honor it was Agree for his deposition;

But there Att said he would not be available, so, EX G. Tyndall is on medical until LEAST DEC.

And is unavailable for deposition until that time, ✓
(Both Had Agree) Counsel And me) - EX G.

Also, Counsel State on Friday Oct. 19, 2007 Plaintiff Again file objection to his deposition, / The Reason was not A objection, But Rule Violation R.30.1 / Also R.26 - P.37- Reasonable notice for Taking depositions. EX D.

Counsel Contends I was trying to delay my deposition which is entire, I Am not A Lawyer and Trying to work with out one, Because I was Dined One Back on Aug 16 07. And Try to do Best I Can. (I Am not A Lawyer), But I Do Have Due process. (for motions and Appeals). So I Am ~~NOT~~ Try to delay this Deposition - In Fact it is the Counsel delay the Deposition, for not giving me and This Court Tydall Date and Time for His Deposition, And Trying to mislead this Court As well; Evidence Show its. if COURT give me A Lawyer to Help me, it would be HELPFULL. (under TITLE 42 USC 2815, (I Am Trying) - I would respectfully Request A Brief conference with the Court And All parties to discuss this Issue And Reach A prompt Resolution. (NOT TO DISRespect the Court)

Counsel STATES - This Extension is sought in good faith And not for the purpose of delay (But will not give me and the Court A Date and Time for Deposition Tydall deposition. -

Counsel STATES - Plaintiff - PRO-SS - Objects to this Requested Extension.

Your Honor I NEVER saw there motion for extension UNTIL today 10-25-07 - I never Had the opportunity to Respond before Judges Order Granting there motion for extension.

I Have the Right to Respond with Evidence.

Where fore, for the foregoing reasons
 plaintiff has, the Right to Respond before
 the order was enter. (Due process) - There was
 Agreement set for Sept, 21, 07 and Mr. William
 never show up. Evidence Attach. But I Also came
 there for my deposition on Oct 24, 07 At 9:00.

Your Honor Counsel there Deadline for Discovery
 and never file for extension until After I have no
 problem with there extension, But I wanted to set
 the records right, and the opportunity to do so.

plaintiff Also would Agree for A Request A
 Brief Conference call between the Court
 And the parties to this issue may be Resolved
 And for such further Relief As the Court deems
 necessary In the premises. Your Honor Evidence
 are Attach. Also see Letter From Court Report of
 Oct, 24, 07 - Agreeable By Both parties not Sept. 8, 07.

Conf. of Service:

Honorable Joseph FARRAR -

8 Clark St Amos Cherin & Mellett

300 Del. Avenue, Suite 1360

W.R. Dd. 19801

Thank you

Roland C. Anderson

113404th St,

W.R. Dd. 19804

DATE Oct. 25, 07



MICHAEL A. WILLIAMS
(816) 460-5562
EMAIL: MWILLIAMS@LATHROPGAGE.COM
WWW.LATHROPGAGE.COM

BUILDING 32, STE 1000
10851 MASTIN BLVD
OVERLAND PARK, KANSAS 66210
(913) 451-5100, FAX (913) 51-0875

September 7, 2007

VIA FEDEX

Roland C. Anderson
113 Lloyd St.
Wilmington, DE 19804

Re: Anderson v. GM

Dear Mr. Anderson:

As soon as practical, we need to get some dates for your deposition during the month of September to be taken at the offices of our local counsel in Wilmington.

Thank you for your time and prompt attention to this matter. If we do not receive dates from you on or before September 14, 2007, we will have to proceed with noticing up the deposition.

Very truly yours,

LATHROP & GAGE L.C.

By:

A handwritten signature in cursive script that reads "Michael A. Williams".

Michael A. Williams

:raf

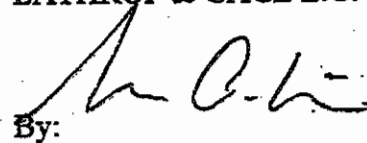
CC 1935178v1

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Change Your Expectations.

Roland C. Anderson
September 10, 2007
Page 2

Very truly yours,

LATHROP & GAGE L.C.

A handwritten signature in dark ink, appearing to read "M. Williams", is written over the printed name.

By:

Michael A. Williams

raf

(7) The officer before whom the deposition is taken shall then identify himself or herself and swear the deponent on the record.

(b) Conclusion. At the conclusion of the deposition, the operator shall state on the record that the deposition is concluded. When the length of the deposition requires the use of more than one electronic file or recorded media, the end of each file or recorded media and the beginning of each succeeding file or recorded media shall be announced on the record by the operator.

(c) Timing by Digital Clock. The deposition shall be timed by a digital clock on the record which shall record and show continually each hour, minute and second of the deposition.

(d) Custody. Counsel for the party taking the deposition shall take custody of and be responsible for the safeguarding of the recorded media. The custodian shall permit the viewing of the electronic file or recorded media, and shall provide a copy of such upon the request and at the cost of a party.

RULE 30.5. Original Deposition Transcripts.

It shall be the duty of the party on whose behalf the deposition was taken to make certain that the officer before whom it was taken has delivered the original transcript to such party.

RULE 30.6. Depositions Upon Oral Examination.

From the commencement until the conclusion of deposition questioning by an opposing party, including any recesses or continuances, counsel for the deponent shall not consult or confer with the deponent regarding the substance of the testimony already given or anticipated to be given, except for the purpose of conferring on whether to assert a privilege against testifying or on how to comply with a court order.

RULE 37.1. Discovery Motions to Include the Discovery at Issue.

Any discovery motion filed pursuant to Fed. R. Civ. P. 26 through 37 shall include, in the motion itself or in a memorandum, a verbatim recitation of each interrogatory, request, answer, response, or objection which is the subject of the motion or shall have attached a copy of the actual discovery document which is the subject of the motion. E 7

VI. TRIALS

RULE 38.1. Notation of "Jury Demand" on the Pleading.



MICHAEL A. WILLIAMS
(816) 460-5562
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2345 GRAND BOULEVARD
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KANSAS CITY, MISSOURI 64108-2684
(816) 292-2000, FAX (816) 292-2001

September 10, 2007

VIA FEDEX

Roland C. Anderson
113 Lloyd St.
Wilmington, DE 19804

Re: Anderson v. GM

Dear Mr. Anderson:

This correspondence confirms and follows up our conversation from this morning. Specifically, we discussed your receipt of my letter dated September 7, 2007 and your recent appeal filed with the Third Circuit. As we also discussed, I have not and will not provide legal advice with regard to this case. However, the District Court's order sets dates by which discovery must be completed and motions must be filed. As such, we have requested that you provide dates that you are available for your deposition to me on or before September 14, 2007. It is my understanding from our conversation that you have requested the Third Circuit provide some correspondence indicating that this case is stayed until they rule on your motion for rehearing en banc or until you proceed to the Supreme Court. You have also made some allegation with regard to contacting disciplinary counsel as you believe your due process rights are being compromised.

As I made clear to you in our conversation, unless and until I receive further direction from the Court, we need to proceed with the scheduling of your deposition. If you have not provided proposed dates to me by close of business on September 14, 2007, we will proceed with scheduling your deposition without your input. However, as we do not wish to have our client incur the cost of my traveling from Missouri to Ohio for a deposition if you are refusing to attend, we need some clarification from you on this point. Please understand that to the extent you fail and refuse to provide dates for your deposition and/or attend fail to your deposition, we will file the appropriate motions with the Court seeking the dismissal of this action and reimbursement of costs and fees.

Thank you very much for your time and prompt attention to these matters.

CC 1935509v1

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Change Your Expectations.

Roland C. Anderson
September 10, 2007
Page 2

Very truly yours,

LATHROP & GAGE L.C.

By: 

Michael A. Williams

:raf

In the case of ~~motion~~ ~~to~~ ~~dismiss~~
Colonel E. Anderson
VS,
General Motors

3 08/10/07

EXD

motion to dismiss his order for
A deposition R.30.1 / Also R.26 - P.37

Rule 30.1 states - for Reasonable notice for taking depositions
Unless otherwise ordered by the Court, "reasonable
Notice" for the taking of depositions under Fed.
R. Civ. P. 30(b) (1) shall be not LESS than five days.
EXA R.30.1 attach.

Judge FARNAN "order was on Aug 16, 07. I receive
A VIA - FedEx From Att. MICHAEL A. WILLIAMS

which states on Sept. 7, 2007.
AS SOON AS PRACTICAL we need to get
some dates for your deposition during the month
of Sept. to be taken at the offices of our local counsel
in WI. - see letter attach EXB. Att: MICHAEL A.
WILLIAMS mis the deadline. Also he never notified the Court
R.26

Conf. of services
District Court of Cal.
Michael A Williams Esq.

Thank you
Colonel E. Anderson
113 Lloyd St.
Mil. WI. 53204

DATE 5/11/07

Rule 23.1

LOCAL DISTRICT COURT CIVIL RULES

IV. PARTIES.

Rule 23.1. Designation of "Class Action" in the caption.

In any case sought to be maintained as a class action, the complaint pleading asserting a class action, shall include next to its caption, the "Class Action."

Source. — Model Local Rule 23.1.

V. DEPOSITIONS AND DISCOVERY.

Rule 26.1. Form of certain discovery papers and permissible number of requests.

(a) *Sequential numbering.* The parties shall number each interrogatory, request, answer, response, or objection sequentially, regardless of the number of sets of interrogatories or requests.

(b) *Permissible number of interrogatories, document requests, requests for admission and depositions.* Unless otherwise ordered by the Court, there shall be no limitation upon the permissible number of document requests, requests for admission, or depositions, but no party shall propound more than 50 interrogatories to any other party. Each subpart shall be counted as a separate interrogatory.

(c) *Form of responses.* The party answering, responding, or objecting to written interrogatories, requests for production of documents or things, or requests for admission served pursuant to Rules 33, 34 or 36 of the Federal Rules of Civil Procedure may state any general objections and then shall quote each such interrogatory or request in full immediately preceding the statement of any answer, response, or objection thereto.

Source. — Model Local Rule 26.1; former Delaware Local Rule 26.1 with revisions.

Rule 26.2. Confidentiality.

If any documents are deemed confidential by the producing party and the parties have not been able to agree on an appropriate protective order, until a protective order is in effect, disclosure should be limited to members and employees of the firm of trial counsel who have entered an appearance, and, where appropriate, have been admitted *pro hac vice*. Such persons are under an obligation to keep such documents confidential and to use them only for purposes of litigating the case.

Source. — Former Local Rule 26.2.

Rule 30.1. Reasonable notice for taking depositions.

Unless otherwise ordered by the Court, "reasonable notice" for the taking of depositions under Fed. R. Civ. P. 30 (b) (1) shall be not less than five days.

Source. — Former Delaware Local Rule 4.3A (first sentence).

30.2. Depo:
ending resolut:
objecting part
position to whic
ely filing of a r
which the motion

Source. — Forme
4A (second and thir

Rule 30.3. Who
Unless otherw:
deposition may be
and members and
(4) an officer or e
as its representa
consultant or exp
order has been e
have access to
excluded while a
or information.

Source. — Form
4.1D.

Rule 30.4. Pro

(a) *Beginning*
shall begin by 1
address, (2) the
and place of the
witness, and (6)
officer before w
herself and swe
the operator sh
length of the de
tape and the be
by the operator

(b) *Timing b*
on camera whic
tape of the dep

(c) *Custody.*
custody of and
permit the vie
portion thereo:

(d) *Trial or*
videotape dep
excluded on
testimony of o
shall remain i

(e) *Objectio*
handling at ti
devices includ

EXE

WHEREAS, upon review of the factors, the Court concludes that a stay pending appeal is not warranted;

NOW THEREFORE, IT IS HEREBY ORDERED that:

- 1) Plaintiff's Motions To Stay (D.I. 39, 43) are DENIED;
- 2) The deadline for fact discovery is extended until October 12, 2007;
- 3) The deadline for filing case dispositive motions is extended until November 9, 2007.

August 16, 2007


UNITED STATES DISTRICT JUDGE

EXP

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ROLAND C. ANDERSON,

Plaintiff

v.

GENERAL MOTORS CORPORATION,

Defendant.

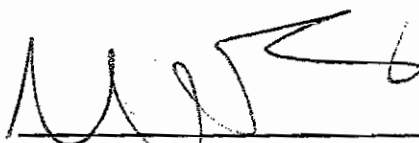
Civil Action No. 05-877 JJF

NOTICE OF DEPOSITION

TO: Roland C. Anderson
113 Lloyd St.
Wilmington, DE 19804
Pro se plaintiff

Please take notice that defendant will take the deposition of *pro se* plaintiff Roland C. Anderson, on October 24, 2007, beginning at 9:00 a.m., at the offices of Eckert Seamans Cherin & Mellott, LLC, 300 Delaware Ave., Suite 1210, Wilmington, DE 19801. The deposition will be continued from day to day beginning at 9:00 a.m. until completed and the witness is excused. The deposition will be taken before a duly certified court reporter and can be used for all purposes permitted under Federal Rules of Civil Procedure, including trial. All parties are invited to attend and participate.

Respectfully submitted,



Michael G. Busenkell (Del. Bar #3933)
Margaret F. England (Del. Bar #4248)
Eckert Seamans Cherin & Mellott, LLC
300 Delaware Avenue, Suite 1210
Wilmington, DE 19801
(392) 425-0430

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ROLAND C. ANDERSON,

Plaintiff

v.

Civil Action No. 06-669 JJF

GENERAL MOTORS CORPORATION,

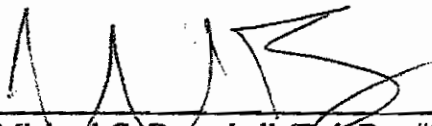
Defendant.

NOTICE OF DEPOSITION

TO: Roland C. Anderson
113 Lloyd St.
Wilmington, DE 19804
Pro se plaintiff

Please take notice that defendant will take the deposition of *pro se* plaintiff Roland C. Anderson, on October 24, 2007, beginning at 9:00 a.m., at the offices of Eckert Seamans Cherin & Mellott, LLC, 300 Delaware Ave., Suite 1210, Wilmington, DE 19801. The deposition will be continued from day to day beginning at 9:00 a.m. until completed and the witness is excused. The deposition will be taken before a duly certified court reporter and can be used for all purposes permitted under Federal Rules of Civil Procedure, including trial. All parties are invited to attend and participate. ✓

Respectfully submitted,



Michael G. Busenkell (Del. Bar #3933)
Margaret F. England (Del. Bar #4248)
Eckert Seamans Cherin & Mellott, LLC
300 Delaware Avenue, Suite 1210
Wilmington, DE 19801
(302) 425-0430

Discovery Documents

1:06-cv-00669-JJF Anderson v. General Motors

Paper Documents

U.S. District Court

District of Delaware

Notice of Electronic Filing

The following transaction was entered by Busenkell, Michael on 10/2/2007 at 5:00 PM EDT and filed on 10/2/2007

Case Name: Anderson v. General Motors

Case Number: 1:06-cv-669

Filer: General Motors

Document Number: 13

Docket Text:

NOTICE to Take Deposition of Roland C. Anderson on October 24, 2007 by General Motors.(Busenkell, Michael)

1:06-cv-669 Notice has been electronically mailed to:

Michael Busenkell mbusenkell@eckertseamans.com

1:06-cv-669 Notice has been delivered by other means to:

Roland C. Anderson
113 Lloyd St.
Wilmington, DE 19804

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1079733196 [Date=10/2/2007] [FileNumber=453200-0]
[91373c75d861966b0b054fe3d8c32a88d4e6431a0be0650ee87863fa2a629929a92a
5ab428c438c41b7d2aaa633273feb2141c6747719b2a53241940bd8f970a]]

10/03/2007	<u>58</u>	NOTICE to Take Deposition of Roland C. Anderson on October 24, 2007 at 9:00 a.m. by General Motors.(Busenkell, Michael) (Entered: 10/03/2007)
10/11/2007	<u>59</u>	USCA Order Terminating Appeal as to <u>51</u> Notice of Appeal filed by Roland C. Anderson. USCA Decision: Appeal Dismissed for lack of appellate jurisdiction. (pr,) (Entered: 10/11/2007)
10/12/2007	<u>60</u>	RESPONSE to Discovery Request filed by Roland C. Anderson.(rwc) (Entered: 10/12/2007)
10/19/2007	<u>61</u>	Document titled "Motion to this Court/Violation of Judge's Order", construed as OBJECTIONS to 58 Notice to Take Deposition - filed by Roland C. Anderson. (rwc) (Entered: 10/19/2007)
10/22/2007	<u>62</u>	MOTION for Extension of Time to Complete Discovery and file Motion for Summary Judgment - filed by General Motors. (England, Margaret) (Entered: 10/22/2007)
10/23/2007	<u>63</u>	ORDER granting 62 MOTION for Extension of Time to Complete Discovery and file Motion for Summary Judgment filed by General Motors. Setting Scheduling Order Deadlines Discovery due by 11/8/2007., Dispositive Motions due by 12/7/2007. Signed by Judge Joseph J. Farnan, Jr. on 10/23/07. (dab) (Entered: 10/23/2007)
10/24/2007	<u>64</u>	MOTION for Extension of Time to Complete Discovery until at least December 7, 2007 - filed by Roland C. Anderson. (bkb) (Entered: 10/24/2007)

Discovery Documents

1:05-cv-00877-JJF Anderson v. General Motors

APPEAL, LEAD, PaperDocuments

U.S. District Court

District of Delaware

Notice of Electronic Filing

The following transaction was entered by Busenkell, Michael on 10/3/2007 at 9:44 AM EDT and filed on 10/3/2007

Case Name: Anderson v. General Motors

Case Number: 1:05-cv-877

Filer: General Motors

Document Number: 58

Docket Text:

NOTICE to Take Deposition of Roland C. Anderson on October 24, 2007 at 9:00 a.m. by General Motors.
(Busenkell, Michael)

1:05-cv-877 Notice has been electronically mailed to:

Michael Busenkell mbusenkell@eckertseamans.com

1:05-cv-877 Notice has been delivered by other means to:

Roland C. Anderson
Roland C. Anderson, Pro Se
113 Lloyd St.
Wilmington, DE 19804

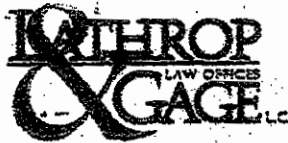
The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1079733196 [Date=10/3/2007] [FileNumber=453347-0]
[7c87cf5bf5d02d9f089a755229e40e35b8775fcf93b77854b16474212c9d163372ea
48d75609acb0d196fe744e8b3bd0a3d2093c87d45808e9a6a6ec38974d8c]]



EXF

MICHAEL A. WILLIAMS
(816) 460-5562
EMAIL: MWILLIAMS@LATHROP&GAGE.COM
WWW.LATHROP&GAGE.COM

2345 GRAND BOULEVARD
SUITE 2800
KANSAS CITY, MISSOURI 64108-2684
(816) 292-2000, FAX (816) 292-2001

October 17, 2007

VIA FEDEX

Roland C. Anderson
113 Lloyd St.
Wilmington, DE 19804

Re: Anderson v. GM

Dear Mr. Anderson:

As you are aware, your deposition is set for October 24, 2007 at our local counsel's office in Wilmington. I properly noticed up this deposition several weeks ago and it will begin at 9:00 a.m. As GM will be incurring the travel and deposition costs for me to attend this deposition, I want to make sure that you understand the importance of your attendance. If you fail to appear for this deposition, we will seek appropriate cost and relief from the Court, including requesting that your case be dismissed with prejudice.

Finally, while you have not noticed up any depositions, I wanted to make you aware that Mr. Tyndall is on medical leave and is unavailable for any deposition on October 24, 2007. Thank you.

Very truly yours,

LATHROP & GAGE L.C.

By:

Michael A. Williams

raf

CC 1946867v1

19
Change Your Expectations



MICHAEL A. WILLIAMS
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EMAIL: MWILLIAMS@LATHROP&GAGE.COM
WWW.LATHROP&GAGE.COM

2345 GRAND BOULEVARD
SUITE 2800
KANSAS CITY, MISSOURI 64108-2684
(816) 292-2000, FAX (816) 292-2001

October 19, 2007

**VIA FACSIMILE: 302-633-1213
AND VIA FEDEX**

Roland C. Anderson
113 Lloyd St.
Wilmington, DE 19804

Re: Anderson v. GM

Dear Mr. Anderson:

As you are aware your deposition is set for October 24, 2007 at our local counsel's office in Wilmington. This deposition was properly noticed several weeks ago and it will begin at 9:00 a.m. I want to reiterate that as GM will be incurring the travel and deposition costs for me to attend this deposition, if you fail to appear for this deposition, we will seek appropriate costs and relief from the Court, including requesting that your case be dismissed with prejudice.

Mr. Tyndall is on medical leave until at least December and is unavailable for any deposition until that time. Additionally, as Mr. Tyndall was not involved in any decision related to the allegations in your Complaint we do not believe his deposition should hold up the resolution of this matter. Thank you.

Very truly yours,

LATHROP & GAGE L.C.

Dictated but not reviewed by
Mr. Williams to expedite delivery.

By:

Michael A. Williams

CC 1947448v1

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Change Your Expectations™



October 24, 2007

CASE CAPTION: Anderson v General Motors Corporation

Dear mr. Anderson:

The transcript of your deposition, taken 10-24-07 in the above-referenced matter, has been prepared and is available in our office for you to read and sign.

We will provide you with an Errata Sheet on which you may indicate changes or corrections. Under the applicable rules, you have thirty (30) days within which to sign your deposition. Otherwise, it may be filed as transcribed.

Our office is open 8:30 a.m. to 5:00 p.m., Monday through Friday. Please call for an appointment.

Thank you for your prompt attention to this matter.

Sincerely,

Kristina Flynn
Production Manager